

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

STERLING D. BROWN,
Plaintiff,

v.

Civil Action No. 2:18-cv-922

City of Milwaukee, et al.
Defendants.

PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE RULE 68 OFFER OF
JUDGMENT

Now comes the PLAINTIFF, Sterling Brown, by and through his attorneys, GINGRAS, THOMSEN & WACHS LLP, and moves this court for an order striking the Defendants' Rule 68 offer of judgment. The reasons for this motion are set forth in detail in the accompanying brief and affidavit.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Defendant's Offer of Judgment be stricken, or otherwise ordered invalid under this Court's inherent authority.

Dated at Milwaukee, Wisconsin this 8th day of October, 2019.

Respectfully Submitted:

GINGRAS, THOMSEN & WACHS, LLP

/s/ Mark L. Thomsen

Mark L. Thomsen

State Bar No.: 1018839

219 N. Milwaukee St., Suite 330

Milwaukee, WI 53202

Telephone: (414) 935-5482

Email: mthomsen@gtwlawyers.com